

# Exhibit A

Date Filed 5/21/2025 9:51 AM  
Superior Court - Suffolk  
Docket Number

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**COMMONWEALTH OF MASSACHUSETTS SUFFOLK, ss.**  
**IN THE SUPERIOR COURT**

ANDREW HINESLEY,  
Plaintiff,  
v.

Gray Television, Inc.  
d/b/a Hawaii New Now,  
Defendant.

Case No: \_\_\_\_\_

**COMPLAINT FOR DEFAMATION AND REQUEST FOR**  
**INJUNCTIVE RELIEF**

1. Plaintiff Andrew Hinesley brings this action against Hawaii News Now for defamation and seeks injunctive relief.
2. Jurisdiction is proper as Plaintiff resides in Massachusetts and the harm occurred within this jurisdiction.
3. Venue is appropriate because Plaintiff lives in Massachusetts and the harm, including a rescinded job offer, occurred in Massachusetts.

**FACTS**

4. Defendant published an article falsely implying Plaintiff committed a crime, which has not been corrected despite numerous attempts from the plaintiff to turn over documents to the defendant to include evidence and dropped charges.
5. Plaintiff offered documentation confirming another individual was convicted, but Defendant has refused to correct the article.
6. Plaintiff has suffered financial and reputational harm as a result.

**CLAIMS**

7. Defendant's continued publication of false and outdated information constitutes defamation.

<https://www.hawaiinewsnow.com/story/36920426/former-uh-student-pleads-not-guilty-to-sexually-assaulting-teen-girl/>

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<https://www.facebook.com/LynnKawanoHNN/posts/exclusive-another-indictment-in-a-child-sex-assault-case-one-year-after-the-arre/1962833617263240/>

8. Plaintiff has suffered:

- a. One-year lost salary: \$125,000.00
- b. \$10,000 lost signing bonus
- c. \$400/month rent for 2 years: \$9,600
- d. Loss of liquidated assets: \$20,000

### **REQUEST FOR RELIEF**

9. Plaintiff requests:

- a. Damages as listed
- b. Injunction to remove or correct the article
- c. Additional relief as the Court deems just

Dated: 05/21/2025

Respectfully submitted,

/s./ *Andrew Hinesley*

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